

**To:** Hagler, Tom[Hagler.Tom@epa.gov]  
**From:** Obegi, Doug  
**Sent:** Thur 2/26/2015 10:49:29 PM  
**Subject:** FW: New Melones Revised Plan of Operations  
[Comments on draft ROP for New Melones.pdf](#)  
[Draft Revised New Melones Plan of Operations.pdf](#)

**From:** Obegi, Doug  
**Sent:** Wednesday, February 11, 2015 12:00 PM  
**Subject:** New Melones Revised Plan of Operations

After our conversation yesterday, I went through my email and wanted to make sure that we shared these comments with you regarding the proposed revised Plan of Operations for New Melones, which we sent to Reclamation last year. I've also attached the presentation that we got from Reclamation about the proposed plan – is this similar / identical to what you got from them? They were very clear with us that flows under the revised plan were substantially less than flows today, because they feel that it's unfair that they have to meet the D-1641 Vernalis standard, and this proposal was basically intended to make others contribute flow to meet the existing Vernalis flow standard (lower flows on the Stanislaus, higher on the Tuolumne and Merced, but not an overall increase in flows).

Below is a table from the 2012 SWRCB SED (Appendix F), showing baseline flows in the Stanislaus at Ripon. It's not clear from the USBR presentation if their CALSIM flow results are at Ripon or another location, so some caution should be used in comparing slide 14 and the table below. But when I looked at this previously, it seemed that there was a very significant reduction in flows (both because base flows are lower and because the storage offramps in the new plan applied in many years). In addition, keep in mind that the water year distribution for USBR's proposal has wet years in only 8% of years (slide 15), so those flows occur very infrequently (similar to the 90% exceedence below).

**Table F.1-9I. CALSIM-Simulated Baseline Monthly Cumulative Distributions of Stanislaus River at Ripon Flow (cfs) for 1922–2003**

	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	Annual (TAF)
<b>Stanislaus at Ripon Flow (cfs)</b>													
Minimum	103	126	200	158	122	200	449	468	297	236	0	9	229
10%	496	282	250	216	235	314	629	601	407	363	365	312	326
20%	613	299	286	259	272	413	791	772	436	415	380	363	384
30%	980	324	311	296	398	559	1,125	1,113	447	432	393	393	429
40%	1,010	348	322	314	459	638	1,394	1,332	490	438	414	422	476
50%	1,071	364	349	335	491	667	1,625	1,516	718	448	439	434	524
60%	1,160	376	356	350	550	882	1,863	1,799	1,104	457	439	437	612
70%	1,212	423	385	381	597	1,504	2,086	1,956	1,223	509	460	479	668
80%	1,270	470	453	454	670	1,619	2,334	2,386	1,349	585	510	544	719
90%	1,379	546	512	571	1,137	1,914	2,553	2,606	1,521	689	592	668	902
Maximum	2,256	3,321	5,140	8,185	6,255	6,175	3,198	3,315	4,960	4,507	2,694	3,113	2,569
Average	1,037	446	467	584	727	1,055	1,620	1,603	920	554	518	560	609

Hope this is helpful. Happy to talk with you more about this, but probably more productive after the USBR remand meeting on 2/20.

Best,

Doug

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